

# Exhibit A

## **DEFINITIONS**

The Definitions applicable to this Notice of Deposition and the Areas of Inquiry listed below are attached hereto as Exhibit B.

### **Areas of Inquiry**

1. The Debtors' liability insurance program, including all policies applicable to bus, train or automobile accidents from January 1, 2006 through the present. This area of inquiry will include the identification of all insured entities and persons who were involved in the Accidents or have or may have claims asserted against them in connection with the Accidents.

2. The Debtors' claims management of liability claims arising out of bus, train or automobile accidents, including the defense and payment of claims, the applicability of any deductible to the claims, and the rights and responsibilities of the Debtors, National Union Fire Insurance Company of Pittsburgh, PA ("National Union"), Sedgwick Claims Management Services, Inc., Broadspire Insurance Services, Inc., and any other entity involved in the defense, management and payment of claims.

3. The issuance of letters of credit, deposits, pre-payments or other forms of security to National Union or any other insurer of the Debtors with respect to its liability insurance program for bus, train or automobile accidents from January 1, 2006 through the present, including the rights and obligations of the Debtors, National Union, RBS Citizens and any other party to a contract or agreement which relates to the letters of credit issued in favor of the Debtors to the Debtors insurers.

4. The Debtors pre-petition loan obligations, including all letter of credit obligations associated therewith.

5. The impact on the Debtors' estate of any post-petition draw on the Debtors outstanding letters of credit.
6. The documents requested in Stay Relief Movants' Joint Request for Production issued March 28, 2012 and the topics described therein.
7. The documents and topics referenced in the Stay Relief Motions.
8. The documents and topics referenced in Debtors' Objection.
9. The documents and topics referenced in *Motion of the Debtors For Entry of An Order Pursuant to 11 U.S.C. §§ 105 (a), 262 (d), 363 (b), 364 (c)(2) and 503 (b) (I) Authorizing, but not Directing the Debtors to (A) Continue Prepetition Insurance Coverage and Pay all Related Premiums and Obligations Thereunder and (B) Maintain Prepetition Premium Financing Agreements and Pay all Obligations Thereunder, (II) Modifying the Automatic Stay With Respect to Workers' Compensation claims, and (III) Authorizing and Directing Financial Institutions to Honor Related Checks and Transfers* [D.I. 10].;
10. The documents and topics referenced Schedule B to Global Notes, Methodology and Specific Disclosures Regarding the Debtors' Schedules of Assets and Liabilities and Statements of Financial Affairs [D.I.292] for America Charters, Ltd. and other similar Schedules for the Debtors against whom claims have been or may be asserted against them by the Movants related to the damages incurred in the Accidents.